

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cv-21377-DPG

PRESIDENT DONALD J. TRUMP,

Plaintiff,

vs.

MICHAEL D. COHEN

Defendant.

**MOTION FOR E. DANYA PERRY TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of E. Danya Perry of E. Danya Perry PLLC, located at 157 East 86th Street, 4th Floor, New York, NY 10028, 646 349-7550, dperry@danyaperrylaw.com, for purposes of appearance as co-counsel on behalf of Defendant Michael D. Cohen in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit E. Danya Perry to receive electronic filings in this case. In support of this Motion, the undersigned states as follows:

1. E. Danya Perry is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar for the State of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, the United States Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, and the Supreme Court of the United States.

2. Movant, Benjamin H. Brodsky, Esquire, of the law firm of Brodsky Fotiu-Wojtowicz, PLLC, located at 200 SE 1st Street, Suite 400, Miami, FL 33131, (305) 503- 5054, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system.

3. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

4. In accordance with the local rules of this Court, E. Danya Perry has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

5. E. Danya Perry, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to E. Danya Perry at email address: dperry@danyaperrylaw.com.

WHEREFORE, Benjamin H. Brodsky moves this Court to enter an Order permitting E. Danya Perry to appear before this Court on behalf of Defendant for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to E. Danya Perry.

Dated: April 24, 2023.

Respectfully submitted,

By: /s/ Benjamin Brodsky

Benjamin H. Brodsky

Florida Bar No. 73748

BRODSKY FOTIU-WOJTOWICZ, PLLC

Counsel for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by Notice of Electronic Filing generated by CM/ECF, on April 24, 2023, on all counsel or parties of record.

By: /s/ Benjamin Brodsky
Benjamin Brodsky, Esq.